

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHAWANDA HUTSON,

Plaintiff,

v.

CHICAGO STEAM BASKETBALL, LLC,

Defendant.

Case No. 14-cv-01674

Honorable John Z. Lee

MOTION FOR ENTRY OF DEFAULT JUDGMENT

NOW COMES the Plaintiff, Shawanda Hutson, by and through her undersigned attorneys, and in support of her Motion for Default Judgment pursuant to Federal Rule of Civil Procedure 55, states as follows:

1. Plaintiff initiated these proceedings on March 11, 2014 seeking seeking recovery against Defendant for violations of Title VII and the Illinois Wage Payment and Collection Act.
2. Defendant was duly served with a copy of the Complaint and Summons on May 5, 2014, as set forth on the attached Affidavit of Process Server (Dkt. # 11).
3. More than twenty (20) days have elapsed since Defendant was served, and it has failed to answer, plead, or otherwise defend the allegations of Plaintiff's Complaint.
4. Defendant's failure to defend and deny the allegations of Plaintiff's Complaint results in those allegations being admitted and Plaintiff therefore moves the Court for the entry of Default Judgment.
5. Plaintiff, through counsel, has attempted to notify Defendant of this Motion as detailed in the attached Declaration in Support.

WHEREFORE, the Plaintiff, Shawnda Hutson, by and through her undersigned counsel, respectfully requests that this Court enter an Order of Default Judgment.

Dated: August 27, 2014

RESPECTFULLY SUBMITTED,

By: /s/ Ethan E. White

Ethan E. White

Michael I. Leonard

LEONARD LAW OFFICES

203 North LaSalle, Suite 1620

Chicago, Illinois 60601

(312) 380-6634 (direct)

ewhite@leonardlawoffices.com

mleonard@leonardlawoffices.com

Shawanda Hutson

Plaintiff/Petitioner

vs

Chicago Steam Basketball 14 CV 1674

Defendant/Respondent

Case#

Being duly sworn, on my oath, I
 declare that I am a citizen of the United States, over the age of eighteen and not a party to this action.

Service: I served Christopher Moss
 NAME OF PERSON/ENTITY BEING SERVED

with the (documents) ☐ Subpoena with \$ _____ witness fee and mileage

Summons; Complaint

by serving (NAME)

Ron Hicks, Owner

at ☐ Home☒ Business

30 E. Adams St. Suite 600a, Chicago IL

☒ on (DATE)

May 5, 2014

at (TIME)

11:05 AM

Thereafter copies of the documents were mailed by prepaid, first class mail on (DATE)

From (CITY)

(STATE)

Manner of Service:☐ By Personal Service

☒ By delivering, during office hours, copies at the office of the person/entity being served, leaving same with the person apparently in charge thereof, namely,

Ron Hicks, Owner

☐ By leaving a copy at the defendant's usual place of abode, with some person of the family or a person residing there, of the age of 13 years or upwards, and informing that person of the general nature of the papers

☐ By posting copies in a conspicuous manner to the address of the person/entity being served.

Non-Service:

After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

☐ Unknown at Address☐ Evading☐ Other:☐ Address does not exist☐ Service cancelled by litigant☐ Moved, Left no forwarding☐ Unable to serve in a timely fashion

Service Attempts: Service was attempted on: () , () , ()

DATE TIME

DATE TIME

DATE TIME

() , () , ()

DATE TIME

DATE TIME

DATE TIME

DATE TIME

Description:☒ Male☐ White Skin☒ Black Hair☐ White Hair☐ 14-20 Yrs.☐ Under 5'☐ Under 100 Lbs.☐ Female☒ Black Skin☐ Brown Hair☐ Balding☐ 21-35 Yrs.☐ 5'-5'3"☐ 100-130 Lbs.☐ Brown Skin☐ Blond Hair☒ 36-50 Yrs.☐ 5'4"-5'8"☐ 131-160 Lbs.☒ Glasses☐ Yellow Skin☐ Gray Hair☐ Mustache☐ 51-65 Yrs.☐ 5'9"-6'☐ 161-200 Lbs.☐ Red Skin☐ Red Hair☐ Beard☐ Over 65 Yrs.☒ Over 6'☒ Over 200 Lbs.

OTHER IDENTIFYING FEATURES:

State of Illinois County of Cook

Subscribed and sworn to before me

A notary public, this 5 day of May, 2014

Notary Public

Christopher Moss
 SERVED BY



CHARTER MEMBER NATIONAL ASSOCIATION OF PROFESSIONAL PROCESS SERVERS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SUMMONS IN A CIVIL CASE

SHAWANDA HUTSON

CASE NUMBER: 14-cv-01674

V.

ASSIGNED JUDGE: Judge Edmond E. Chang

CHICAGO STEAM BASKETBALL, LLC

DESIGNATED
MAGISTRATE JUDGE:

TO: (Name and address of Defendant)

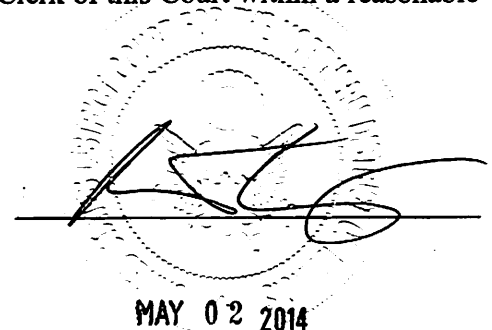
Mr. Ron Hicks, Owner C/O
Chicago Steam Basketball
30 E. Adams, Suite 600a
Chicago, Illinois 60603

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Michael I. Leonard
Leonard Law Offices
203 North LaSalle, Suite 1620
Chicago, Illinois

an answer to the complaint which is herewith served upon you, 21 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

THOMAS G. BRUTON


MAY 02 2014

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Case No. 14-cv-01674

Honorable John Z. Lee

DECLARATION OF ETHAN WHITE
SUPPORTING PLAINTIFF'S REQUEST TO ENTER DEFAULT

I, Ethan White, declare as follows:

1. I am an attorney at law licensed to practice in Illinois, and admitted in the Northern District of Illinois. My business address is 203 North LaSalle, Suite 1620, Chicago, Illinois 60601. I am counsel of record of Plaintiff in this matter.

2. On August 27, 2014, and contemporaneous with the filing of Plaintiff's *Motion for Entry of Default Judgment*, I caused a copy of that Motion to be sent to Defendant via U.S. Postal Registered Mail at: 30 East Adams, Suite 600a, Chicago, Illinois 60603, where Defendant's President was served on May 5, 2014.

3. Defendant failed to respond to Plaintiff's Complaint and has failed to appear in this case.

4. Defendant is an Illinois corporation with its principal place of business in Chicago, Illinois.

5. I declare upon penalty of perjury that the foregoing is true and correct based on my own personal knowledge, except for those matters stated on information and belief, and those

matters I believe to be true. If called upon to testify, I can and will completely testify as set forth above.

Dated: August 27, 2014

RESPECTFULLY SUBMITTED,

By: /s/ Ethan E. White

Ethan E. White

Michael I. Leonard

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